

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Index No. 02-CV-2670

**MOTION FOR PRO HAC VICE
ADMISSION**

EMILY M. SCORDELLIS,

Plaintiff,

vs.

McDONALD'S CORPORATION, INC.,

Defendant.

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Pursuant to Local Rule 83.5.2 of the Local Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania, Defendant McDonald's Corporation, Inc. ("McDonald's") by and through its undersigned counsel, a member of the Bar of this Court, hereby requests that Eric D. Witkin be permitted to represent McDonald's *pro hac vice* in all proceedings in this action. Ernest Sasso, Esq., counsel for Plaintiff, consents to this motion and this admission.

Mr. Witkin is counsel to the law firm of Brown Raysman Millstein Felder & Steiner LLP, 900 Third Avenue, New York, New York 10022. He is admitted to practice, and in good standing, in the State of New York and the District of Columbia. Mr. Witkin also is admitted to practice before the United States District Courts for the Southern, Western and Eastern Districts

of New York, and the District of Columbia, as well as the United States Supreme Court and the United States Courts of Appeals for the Second and District of Columbia Circuits.

Mr. Witkin has not been disciplined by any Court. He has familiarized himself with the Eastern District of Pennsylvania's Local Rules, and agrees to abide by them.

There exists good cause supporting this application. (*See* Declaration of Eric D. Witkin in support of this application.) In addition, Mr. Witkin is professionally associated with Joel L. Finger, who has a longstanding attorney-client relationship with McDonald's predating the litigation at bar, representing McDonald's in various federal and state courts. By reason of that relationship, Mr. Finger has acquired a specialized knowledge with respect to McDonald's affairs important to its defense of this matter and has asked Mr. Witkin to assist him in that defense. Defendant McDonald's has expressed a desire to have Mr. Finger and Mr. Witkin represent Defendant McDonald's in this case.

In support of said motion McDonald's relies upon the annexed Declaration of Eric D. Witkin, dated October 1, 2002. A proposed form of order is submitted herewith.

WHEREFORE, Defendant McDonald's respectfully request that Mr. Witkin be admitted *pro hac vice*.

Dated: October __, 2002

Respectfully submitted,

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